

STONE MAGNANINI

COMPLEX LITIGATION

January 6, 2023

VIA ECF

Hon. John Michael Vazquez, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

SO ORDERED.

s/ John Michael Vazquez
John Michael Vazquez, U.S.D.J.

Date: 1/10/2023

Re: *United States et al. ex rel. Simpson v. Bayer Corp. et al.*,
5-cv-3895 (JMV)(LDW)

Dear Judge Vazquez:

I write on behalf of myself and my law firm, Stone & Magnanini LLP. We are former counsel to the Relator, and have an interest in the Court's determination of Relator's claims for reasonable attorneys' fees, expenses and costs under 31 U.S.C. § 3730(d)(2) and (h)(2), and analogous provisions of applicable state law.

The date for making applications under those provisions for fees, costs, and expenses is currently set at **January 6, 2023**. Dkt. 407 at 2 (December 14, 2022, Order entering stipulated dismissal of Relator's claims, while retaining jurisdiction over questions of fees, costs, and expenses, and enforcement of the settlement). I write to seek a brief extension, to **January 13, 2023**, to submit such an application. This extension is reasonable given the vintage of the underlying action and attendant difficulties with excavating the evidence necessary to put in a helpful accounting of fees, expenses, and costs.

This is the first extension request we have submitted.

I have spoken with Defendants' counsel, and they consent both to our appearance for purposes of submitting a fee application, and to the requested extension.

Accordingly, we respectfully request leave to intervene and appear in the case for the limited purposes of making a fee application, and a one-week extension to make that application.

Truly yours,

/s/ David S. Stone

David S. Stone, Esq.